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December 22, 2023

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Nina R. Morrison, U.S.D.J.
225 Cadman Plaza East
Courtroom 6E North
Brooklyn, NY 11201-1804

Re: Paccha v. APS Electric, Inc., et al.
Case No: 1:23-cv-2075 (NRM) (MMH)
MLLG File No.: 86-2023

Dear Judge Morrison:

This office represents the Defendants APS Electric, Inc. (hereinafter “APS” or the “Corporate Defendant”) and Mikhail Mikhaylov (hereinafter “Mikhaylov” or the “Individual Defendant”) (the Corporate Defendant and the Individual Defendant collectively hereinafter the “Defendants”) in the above-referenced case. See ECF Docket Entry [11](#). Defendants write pursuant to ¶ 5.2.3.1 of this Court’s Individual Practice Rules (“IPR”) to respectfully submit a letter specifying each document that has been filed by either party with respect to their motion to dismiss and compel arbitration.

ECF Docket Entry [21](#) – Defendants’ notice of motion to dismiss and compel arbitration, or in the alternative, for a stay pending arbitration;

ECF Docket Entry [22](#) – Defendants’ memorandum of law in support of same;

ECF Docket Entry [23](#) – Declaration of Genadi Tanfilov in support of same with accompanying exhibits [A](#), [B](#), and [C](#);

ECF Docket Entry [24](#) – Plaintiff’s memorandum of law in opposition;

ECF Docket Entry [25](#) – Declaration of Michael Taubenfeld in opposition with accompanying exhibits [A](#) and [B](#);

ECF Docket Entry [26](#) – Declaration of Juan Paccha in opposition; and

ECF Docket Entry [27](#) – Defendants’ reply memorandum of law in further support of their motion to dismiss and compel arbitration, or in the alternative, for a stay pending arbitration.

Defendants thank this honorable Court for its time and attention to this case

Dated: Lake Success, New York
December 22, 2023

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Emanuel Kataev, Esq.

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